



# Oil and Gas Environmental Impact Statement Newsletter - May 2001



## What are we doing?

The Bureau of Land Management and the State of Montana through the Department of Environmental Quality and the Montana Board of Oil and Gas Conservation are developing an Environmental Impact Statement on oil and gas development including coal bed methane.

The planning area for the Bureau of Land Management (BLM) encompasses a 13 county area and approximately 3.2 million acres of oil and gas estate administered by the BLM Billings Field Office and the Miles City Field Office.

The State of Montana is evaluating the effects of further permit applications in BLM's planning area and other areas around the state including portions of Blaine, Park and Gallatin Counties.

## What happened during the scoping process?

During the initial public involvement process or "scoping", the public was invited to review and comment on issues identified by the BLM and the State of Montana, identify new issues and alternatives, and/or comment on the Draft Planning Criteria.

In December 2000, we mailed approximately 700 scoping information letters based on a combination of BLM and State of Montana mailing lists. The comment period was originally scheduled to end January 17 but it was extended two weeks and ended January 31, 2001. Five public scoping meetings were held in Billings, Broadus, Ashland, Miles City, and Helena. Over 300 people attended the five statewide meetings. Those in attendance included ranchers, landowners, the media, representatives of the Crow and Northern Cheyenne Tribes, other State and Federal agencies, public interest groups, private contractors, industry, and the general public.

More than 300 letters, comment forms, verbal recordings and e-mails were submitted during the scoping period. Those responses generated more than 2100 comments that will be used during the EIS development. The largest number of comments received (850) were related to water resources issues.

Comments that were issue specific and/or identified the cause of a problem were most helpful in identifying issues

and alternatives. Your comments assist us in ensuring that we have analyzed all possible issues and that all potential alternatives are identified for the decision makers.

You provided many excellent comments and questions related to this proposal and the impacted resources. The following is a brief summary of what we heard. Many of the comments related to one of the following categories:

## What did we hear you say?

***Air Quality*** - Comments indicated a need for the EIS to consider cumulative impacts on air quality, to assess the impacts from the release of greenhouse gases, and to examine dust control measures related to construction activities, vehicles, and compressors.

***Cultural Resources*** - Identified a need to conduct cultural resources surveys to identify and protect cultural resources including sacred sites.

***Geology and Minerals*** - Comments ranged from the possibility of spontaneous combustion of methane gas and underground fires to the need to minimize methane seeps and the potential for hydrogen sulfide release.

***Indian Trust and Native American Concerns*** - EIS needs to consider impacts to tribal resources, culture and economy from oil and gas development and impacts to social services.

***Lands and Realty*** - EIS needs to consider the effects of the construction of roads, pipelines, power lines, and drilling to land use. Also heard concerns related to spacing of wells, subsidence, and reclamation. Comments stressed the need for protection of groundwater resources for surface owners and the importance of involving surface owners when development is planned or when discharge may take place on their land.

***Livestock Grazing*** - Identified the need to evaluate the impact on agriculture, livestock, and ranching operations from CBM development or water discharge.

***Recreation*** - Comments discussed impacts to recreational activities such as hunting and fishing and the potential impacts of new roads.

**Special Status Species** - EIS needs to identify and discuss impacts to threatened and endangered plant and animal species.

**Social Economic Values** - Comments focused on three areas - impacts to current lifestyles in the area, impacts created by new jobs, increased population, and the affect on agencies such as police, fire, welfare, and hospitals, and increased revenues to government and mineral and surface owners.

**Solid and Hazardous Waste** - Concerned about the use of hazardous materials and the potential for misuse as part of CBM development.

**Soils** - Comments cited potential impacts of high salinity produced water discharge on soils and cumulative effects such as sodium adsorption ratio (SAR) build-up. Several comments identified the need to address soil erosion and sedimentation of stream beds due to discharge of CBM water.

**Vegetation** - EIS needs to address the impact to native plant species including the potential for spread of noxious weeds. EIS must study the short term and cumulative impact of high volume discharge of produced water and potential productivity loss to agriculture due to CBM development.

**Visual** - Comments discussed the need to address the change in visual quality due to the addition of production wells and facilities, pipelines, and power lines that connect compressor stations.

**Water Resources** - this area generated the most comments (850+) which we further categorized to make reading easier.

**Groundwater Quality and Quantity** - EIS needs to study the cumulative effects of CBM development to water reserves and quality and the effect on aquifer characteristics from the removal of higher quality water from coal seams. EIS needs to analyze potential effects to domestic water wells and springs.

**Surface Water Quality and Availability** - Impacts to surface water quality and quantity due to CBM discharge need to include impacts from Wyoming development. Examine long term effects on surface water availability and quality due to discharge of CBM produced water.

**Waste Water Disposal and Discharge** - Consider injection of waste water rather than surface discharge; study long term effects of discharged water and investigate pre-treatment.

**Water Conservation** - Concerns focused on aquifer draw down, aquifer recharge, and surface discharge.

**Water Rights** - Comments asked how CBM operations will impact water rights in the development area.

**Groundwater Resource Assessment** - Urged an assessment of all water resources prior to development; some comments suggested 3D mapping of aquifers to analyze CBM withdrawal impacts.

**Wildlife** - Comments discussed short term and cumulative effects on wildlife habitat and breeding from CBM development activities; consider impact of CBM development and water discharge on fishing and fisheries production.

Other Issues including **Legal and Institutional, Financial, Design and Engineering, Safety, Restoration, and the EIS Schedule** - Comments in this category urged using an outside monitoring agency to ensure operators comply with applicable rules and regulations. Also cited the importance of following all laws and regulations including MEPA and NEPA, and that regulations should be flexible to allow necessary changes during implementation.

## What happens next?

A draft EIS, displaying a range of alternatives, will be issued by the end of the year. The public will then have an opportunity to comment on the draft EIS during a 90-day comment period. The draft EIS will include a discussion of each alternative and how well each meets the purpose and need for the project, and resolves the issues identified by the public. Public hearings will be held during the comment period with a planned Final EIS by next summer.

## How is the EIS being written?

Arthur Langhus Layne Consulting (ALL) based in Tulsa, Oklahoma is the environmental contractor for the Oil and Gas EIS. ALL has a staff of 15 professionals and to supplement ALL's capabilities on this project, they have added subcontractor CH2M HILL to the project team. CH2M HILL is a large firm with more than 7,000 employees at offices across the country. Both companies have substantial land and resource planning experience with federal and state agencies, and private industry. ALL is responsible for writing the draft EIS for the BLM and the State of Montana. The contract is being funded and managed by BLM.

## Who to contact?

For additional information or questions, please contact:

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You can also visit our website at [www.mt.blm.gov/mcfo](http://www.mt.blm.gov/mcfo) or [www.deq.state.mt.us](http://www.deq.state.mt.us) or write us at:

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